

USA Comments

New

Introduction to OIE Guidelines for the Welfare of Live Aquatic Animals

General comments

The guiding principles for aquatic animal welfare listed in the introductory guidelines are not much different from the previously proposed version released by the OIE in March 2006 and require further revision to emphasize the importance of good husbandry for aquatic animals. Aquatic animal welfare is not defined in this section. Consideration of an appropriate definition for aquatic animal welfare may enhance progress on developing suitable guidelines for aquatic animals. We believe, however, that given the very broad scope of aquaculture animals' specific and highly differing welfare contexts, it is currently impractical to establish a universally acceptable definition of aquatic animal welfare.

Anthropomorphic assumptions regarding aquatic animals should be avoided. We recommend that aquatic animal welfare guidelines focus on measures of good husbandry practices that are subject to scientific analysis. Such best management practices help minimize physiological stress on aquatic animals, thereby helping to prevent disease. Reference to the so-called "internationally accepted five freedoms" is inconsistent with scientific understanding about poikilothermic animal sentience and pain perception. Therefore, to suggest there is an 'ethical' responsibility to ensure welfare or that the OIE members should consider "value based assumptions" is premature. In the specific comment section we propose alternate language concerning the future application of the "five freedoms" to aquatic animals.

Our aquatic animal experts emphasize that the eventual definition of aquatic animal welfare will not necessarily have the same emphases regarding pain or suffering that characterize human welfare or homoeothermic animal welfare in general. Poikilothermic animals are currently considered by many in the scientific community to be far less sentient or perceptive of pain caused by their environment on an absolute or even relative basis, compared to homoeothermic animals.

For future reference, the following comments regarding revisions for the consideration of an appropriate definition for aquatic animal welfare may enhance progress on developing suitable guidelines for aquatic animals.

Specific comments

Article X.X.X.1.

Guiding principles for aquatic animal welfare

Items 1 – 7 should be revised

Rationale: Based on the fact that the "Introduction to the OIE Guidelines for the Welfare of Live Aquatic Animals" contains text that is ambiguous, based on assumptions or not documented by sound scientific data, the United States requests that the introduction be appropriately revised and resubmitted to Member countries for comment.

We propose that the following alternate text for principle no. 5 concerning the ‘five freedoms’ may be more appropriate for aquatic animals at the present time:

That the following adaptation of the ‘five freedoms’ for aquatic animals may provide valuable guidance in assessing their welfare:

- ♦ freedom to express normal patterns of behavior;
- ♦ freedom from injury and disease;
- ♦ freedom from chronic, long-term stress;
- ♦ freedom to occupy optimal osmotic, physiochemical, and thermal conditions; and
- ♦ freedom from malnutrition.